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19
20 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

21 DONALD J. TRUMP, et al.,

22 Plaintiffs,

23 v.

24 YOUTUBE LLC, et al.,

25 Defendants.

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CASE N. 4:21-cv-08009-JSW

**STIPULATED REQUEST FOR AN ORDER
POSTPONING BRIEFING DEADLINES**

Hon. Jeffrey S. White

1 Plaintiffs Donald J. Trump, Kelly Victory, Austen Fletcher, American Conservative Union,
2 Andrew Baggiani, Maryse Veronica Jean-Louis, Naomi Wolf, and Frank Valentine, and Defendants
3 YouTube, LLC and Sundar Pichai (collectively, the “Parties”), by and through their undersigned counsel
4 of record submit the following Stipulation:

5 WHEREAS, on October 29, 2021, the Court granted the Parties’ **Stipulation Setting Briefing**
6 **Schedule for Preliminary Injunction and Motion to Dismiss**, which provided in part that:

7 5. Plaintiffs shall file their Reply in support of their Preliminary Injunction
8 Motion, along with their opposition to Defendants’ anticipated motion to dismiss,
9 in a single combined brief, not to exceed 35 pages, excluding title page, indices of
10 cases, table of contents and exhibits, by January 12, 2022.

11 6. Defendants shall file their reply in support of their anticipated motion to
12 dismiss, not to exceed 20 pages, excluding title page, indices of cases, table of
13 contents, and exhibits, by February 4, 2022.;

14 WHEREAS, Plaintiffs have found it necessary to request an additional time beyond January 12
15 within which to file their Reply given that the recent COVID outbreak has diminished Counsel’s ability
16 to complete its briefing in a timely manner;

17 WHEREAS, the Parties agree that they will benefit from and not be prejudiced by extending these
18 existing deadlines less than a week to January 17 and February 11, respectively; and

19 NOW, THEREFORE, the Parties hereby stipulate and respectfully ask the Court to enter the
20 attached proposed order so as to allow the parties additional time to comply with Paragraphs 5 and 6,
21 *supra*.

1 DATED: January 11, 2022

Respectfully submitted,

2 /s/ Brian M. Willen

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16 *Attorneys for Plaintiffs*

1 **ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

2 I, Andrei D. Popovici, am the ECF User whose ID and password are being used to file this
3 document. I hereby attest that concurrence in the filing of this document has been obtained from the
4 signatories.

5 DATED: January 11, 2022

6 _____
7 Andrei D. Popovici

8 *Attorney for Plaintiffs*